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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 8, 1999

By Hand

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Presentation
California PUC Delegation of Authority — CC Docket No. 96-98, NSD
File No. L-98-136 — FCC 99-248; California PUC Service-Specific NPA
Petition — CC Docket No. 96-98, NSD File No. L-99-36)

Dear Ms. Salas:

This letter serves as notification that on October 7, 1999, Pam Riley, Andrea Cooper and Luisa Lancetti (representing AirTouch Communications, Inc.), had a meeting with Yog Varma, Blaise Scinto, Tejal Mehta, Jared Carlson and Dianne Griffen Harmon (of the Common Carrier Bureau), and David Furth (of the Wireless Telecommunications Bureau) to discuss issues concerning the above-captioned proceedings. In particular, the numbering crisis in California and the suspension of the 424 overlay were discussed. A copy of the presentation material distributed and discussed at this meeting is attached hereto.

We note for the record that since the meeting we have learned that the CPUC modified its earlier 310 order to eliminate the voluntary pooling trial for the 310 NPA because the FCC has sanctioned its mandatory pooling process for LNP capable carriers; however, this fact does not change AirTouch's position, as discussed at the meeting.

Pursuant to Section 1.1206(a), an original and one copy of this letter are being filed with your office. Please associate this letter with the file in the above-captioned proceeding.

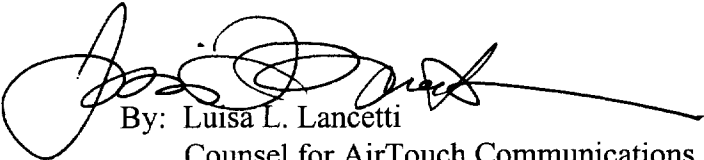
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October 8, 1999
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Please contact us should you have questions concerning the foregoing.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Luisa L. Lancetti
Counsel for AirTouch Communications, Inc.

Attachment

cc: Yog Varma
Blaise Scinto
Tejal Mehta
Jared Carlson
Dianne Griffin Harmon
David Furth

California PUC Delegation of Authority
(CC Docket No. 96-98, NSD File No. L-98-136)
FCC 99-248 (September 15, 1999)

California PUC Service-Specific NPA Petition
(CC Docket No. 96-98, NSD File No. L-99-36)

Ex Parte Presentation
AirTouch Communications, Inc.
October 7, 1999

The California Numbering Crisis is Real and FCC Intervention is Needed

- In September 1999, the CPUC released an Order suspending the 424 overlay to avoid 10-digit dialing. The 310 area code is exhausted and the CPUC has terminated the only extant area code relief plan.
 - Original CPUC Order for overlay recognized that majority of 310 calls currently use 10-digit dialing.
- As of mid-September, 77 pending requests for codes unmet:
 - Only 51 codes were left in the 310 NPA.
 - At rationing rate of 6 codes/month, NPA would exhaust in May 2000.
 - 17 carriers had already been assigned 85 codes from the 424 overlay; some have *no* codes in 310.
- The FCC should supersede CPUC's suspension of the 424 overlay and order NANPA to release 424 immediately.

The CPUC Decision will not Result in Timely Relief

- The CPUC Order sets 16 codes aside for pooling, leaving only 35 codes for new carriers and growth.
 - Voluntary pooling will not provide timely relief, given the number of carriers likely to participate and the lack of incentives provided.
 - Mandatory pooling not a short-term remedy, and no remedy at all for non-LNP carriers.
 - CPUC study on code utilization and reclamation not complete until late spring; pooling will take months to implement.
 - The 16 NXX codes in the pool will be used up almost immediately due to pent-up demand.
- Of the 35 remaining codes, reduction of code rationing from 6 to 2 codes/month ensures that some carriers will be unable to accommodate customers' needs in the next few months.
- Other conservation measures won't help
 - Rate center consolidation unlikely to provide timely relief, given CPUC's past unwillingness to pursue RCC.
 - Service-specific overlays also not a timely option, due to FCC rule barring service-specific overlays.

AirTouch, as a Wireless Carrier, is Particularly Hard Hit by the CPUC Actions

- AirTouch is an efficient number user — it pools number demand by taking numbers from only a few rate centers. As a result, it does not have excess capacity in its NXXs (as many wireline carriers do).
 - AirTouch already does sequential number assignments.
 - AirTouch has no unused NXXs for reclamation.
 - AirTouch is fully utilizing 310 and has submitted supportive data to the Commission.
- AirTouch expects to run out of numbers by June-September 2000, based on historic growth and number usage.
 - Company cannot forecast and plan launch of new services if number availability is uncertain.
 - AirTouch/Bell Atlantic merger focused on introduction of national “one-rate” plans (prominent new growth vehicle).
 - Prepay service is fastest growing segment in market.
- Use of numbers from adjacent NPAs is no solution.
 - Most adjacent NPAs are in similar exhaust situation.
 - Calls from landline phones would incur unnecessary tolls.

AirTouch Proposal

- FCC should supersede CPUC's suspension of 424 overlay for the 310 NPA.
 - Order NANPA to implement all-services overlay promptly.
 - Action needed now; 66 days needed for numbering changes.
 - Split not an option — 30 months notice required by California law.
- FCC should delegate authority to CPUC to ensure prompt and appropriate transition to 10-digit dialing.
 - AirTouch would be willing to accept a limited transition period with permissive 7- and 10-digit dialing.
- FCC should deny CPUC petition for waiver to implement service-specific overlays.
 - AirTouch voluntarily commits to draw all new codes from an all-services overlay once implemented.
 - An overlay that is wireless-first for a fixed initial period, and subsequently all-services, would be acceptable.